

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**CERTAIN UNDERWRITERS AT LLOYDS,  
LONDON, SUBSCRIBING TO POLICY  
UP01US361029**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 3:04CV540LS**

**MAGNOLIA MANAGEMENT CORPORATION;  
BRANDON LIVING CENTER, LLC, d/b/a  
BRANDON COURT; RANKIN COMMUNITY  
CARE CENTER, LLC, d/b/a BRANDON COURT;  
BRANDON COURT, LLC; SANDRA CHAMPION  
BALL; MELISSA JOHNSTON, TRACY  
ROBINSON GARCIE, COLLEEN CAMP and  
JOHN DOES A-Z**

**DEFENDANTS**

---

**PROTECTIVE ORDER**

NOW COME all parties, Plaintiffs and Defendants, through undersigned counsel, who agree that, during the course of this litigation, various confidential information relating to both parties and non-parties in this litigation has been disclosed, and, to protect this information, all parties agree, in accordance with FRCP 26, to this Protective Order.

IT IS, THEREFORE, ORDERED, as follows:

1. This Protective Order should apply to all documents of any type produced during discovery that contain or relate to confidential information.
2. For purposes of this Protective Order, the following constitutes confidential information:
  - a. Any depositions taken during the lawsuit and accompanying exhibits;
  - b. Any and all documents produced by any party during discovery;
  - c. Any and all documents obtained through subpoena during discovery;

- d. Any and all responses to any discovery requests;
- e. Any and all reports prepared pursuant to Rule 26 by any expert in this litigation; and
- f. Any correspondence exchanged between the parties.

3. Confidential information shall not be disclosed, or used by the receiving party or any of its agents for any purpose other than the preparation and trial of this action, post trial pleadings and in the subsequent appeals, with the exception of the following:

- a. When required by an order of a court of competent jurisdiction or otherwise compelled by law; or
- b. With prior written consent of the parties.

4. The provisions of this Order shall be binding on the parties through and after the conclusion of this action, and the court shall retain jurisdiction over the parties to enforce and/or modify this Order.

IT IS SO ORDERED, this the 1<sup>st</sup> day of September, 2006.

S/James C. Sumner

UNITED STATES MAGISTRATE JUDGE

AGREED AND APPROVED:

s/Richard T. Bennett  
RICHARD T. BENNETT  
CHARLES F. BARBOUR  
Attorneys for Plaintiff

s/John A. Stassi II  
JOHN A STASSI II  
J. WARREN GARDNER  
Attorneys for Magnolia Defendants

s/Cynthia H. Speetjens  
CYNTHIA H. SPEETJENS  
Attorney for Plaintiff

s/Larry Yarbrough  
LARRY YARBROUGH  
Attorney for Sandra Champion Ball